

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE: BLUE CROSS BLUE SHIELD )  
ANTITRUST LITIGATION (MDL No. )  
2406), )**

**Plaintiff,**

**) CIVIL ACTION NUMBER:  
) Master File No. 2:13-CV-20000-  
) RDP  
)  
)**

**SELF-FUNDED SUBCLASS OBJECTORS' OBJECTION TO MOTION  
FOR SUPPLEMENTAL NOTICE TO SELF-FUNDED ACCOUNTS**

The Self-Funded Subclass Objectors object to one aspect of the Motion for Supplemental Notice to Self-Funded Accounts. (Doc. 2885). The Supplemental Notice Plan incorporates and relies upon the same incorrect and prejudicial date of September 1, 2015 to define the earliest bound of the class definition for the Self-Funded Subclass. This date is based on the flawed statute of limitations analysis to which the Self-Funded Subclass Objectors have previously objected. The Self-Funded Subclass Objectors incorporate their arguments from their objection (Doc. 2812-19), the reply in support of their objection (Doc. 2845), their arguments at the fairness hearing, and their post-hearing briefing (Doc. 2877) regarding the use of September 1, 2015 as the starting date for determining membership in the Self-Funded Subclass.

Membership in the Self-Funded Subclass should be determined by reference to February 7, 2008, the date used for the Fully Insured Class.

Respectfully submitted this 18th day of January 2022.

*s/J. Thomas Richie*

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One of the Attorneys for Objectors

OF COUNSEL

Michael R. Pennington

J. Thomas Richie

Emily M. Ruzic

BRADLEY ARANT BOULT CUMMINGS LLP

One Federal Place

1819 Fifth Avenue North

Birmingham, AL 35203-2119

Telephone: (205) 521-8000

Facsimile: (205) 521-8800

Scott Burnett Smith

BRADLEY ARANT BOULT CUMMINGS LLP

200 Clinton Avenue West, Suite 900

Huntsville, AL 35801-4900

Telephone: (256) 517-5100

Facsimile: (256) 517-5200

Richard D. Nix

Henry D. Hoss

M. Richard Mullins

Mark D. Spencer

MCAFEE & TAFT A PROFESSIONAL CORPORATION

Eighth Floor, Two Leadership Square

211 N. Robinson

Oklahoma City, OK 73102

Telephone: (405) 235-9621

Facsimile: (405) 235-0439

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2022, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*/s/ J. Thomas Richie*

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J. Thomas Richie